

Non-Profit Corporation

Jerome E. Weinstein, Esq.
(First Vice-President)

EX PARTE OR LATE FILED

93-48

NATIONAL ASSOCIATION FOR BETTER BROADCASTING

9777 Wilshire Boulevard, Suite 1009

Beverly Hills, CA 90212-1901

Telephone: (310)274-7157

Fax: (310)274-1437

RECEIVED

JUN 19 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

May 22, 1996

DOCKET FILE COPY ORIGINAL

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M St. N.W.
Washington, D.C. 20554

Re: The Children' Television Act

Dear Chairman Hundt:

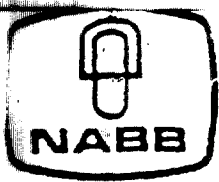
I wish to introduce you to The National Association for Better Broadcasting, the oldest national television consumer association in the nation with activities exclusively related to broadcast program service.

The Association was founded in 1949 by a dedicated and determined Los Angeles group who were outraged at the excessive crime and brutality inflicted upon children in TV entertainment.

At the express urging of Wayne C. Coy, then Chairman of the FCC, the Association became a national organization in order to provide a nationwide public voice in FCC hearings and rule-making.

The organization is governed by a Board of Directors which includes active national and regional leaders in the professions of law, journalism, mental and physical health, education and social welfare. Many noted Americans have been members of the NABB Board during its proud forty-seven year history.

NABB is an organized voice for people who care a great deal for the well-being of all children and all adults. Because we do care, we are actively involved in various matters related to the rights and responsibilities of the public in broadcasting. We act as citizens. We are strongly opposed to censorship. We do not attempt to impose our views on



Non-Profit Corporation

The Honorable Reed Hundt, Chairman
Federal Communications Commission
May 22, 1996
Page Two

anyone. We do, however, express these views, and we use the full extent of our resources to participate actively in the telecommunication affairs of our nation.

NABB encourages the creation of many more quality programs suitable for child audiences. We also participate in efforts to gain greater consideration for the vital needs of racial minorities in both entertainment and public affairs programming.

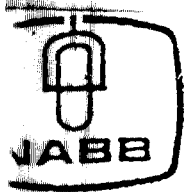
NABB remains in the forefront of efforts to eliminate gratuitous violence and sadism from TV programming accessible to children. NABB first drew national attention to its anti-brutality campaign through a survey reported in Time magazine in 1949.

Our Association has continued from that date with a long history of projects dedicated to its above goals:

--A landmark Settlement Agreement with Station KTTV in Los Angeles in 1972, which pioneered the Caution to Parents, warning parents about movies or shows which contain violent or other objectionable material. This Caution inaugurated a practice now followed throughout the nation by which parents are notified on-screen, before a program with violent or otherwise objectionable content is broadcast, that they should exclude their children from watching.

--A smashing victory in the DC Circuit Court of Appeals, in 1987, upholding NABB's challenge to the qualifications of Los Angeles Station KCOP, who willfully violated Section 317 of the Communications Act by failing to identify its daily afternoon animated "He-Man and the Masters of the Universe" program, as a program-length commercial for Mattel's toys, as required by statutory law.

--NABB has filed numerous Petitions to Deny License Renewals over the years setting forth violations by Stations of the Communications Act, including with respect to the Fairness Doctrine, excessive commercial matter in children's programming, lack of adequate informational and public interest programming, and lack of quality children's programming. Many of these



Profit Corporation

The Honorable Reed Hundt, Chairman
Federal Communications Commission
May 22, 1996
Page Three

Petitions resulted in favorable settlements with the stations involved.

Today, NABB is weighing in on your side in the battle to increase the amount of quality children's programming to be required of all broadcasters.

Although we strongly support your courageous effort to impose a requirement on all broadcasters to schedule at least three hours of original quality television programming per week; we also support the position of more than twenty organizations, representing constituents whose sole purpose is to promote the education, health and welfare of children, who have recommended (in a 55 page document filed with the FCC on October 16, 1995) the following:

--the adoption of a standard of one hour of quality children's programming per day specifically designed to educate and inform children at times when children are likely to be watching;

--no credit to be given for programming aired before seven a.m.;

--the children's programming should be regularly scheduled and standard length so parents and children can easily ascertain when it is on and watch it;

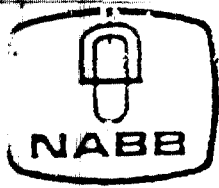
--the FCC should adopt a standard children's programming report and penalize licensees who fail to comply with reporting requirements;

--the FCC should educate the public about what the Children's Television Act and its rules require and what action they can take to enforce the CTA;

--the FCC should not wait until license renewal time to ensure stations comply with the CTA during the license terms;

--to ensure responsible programming by the station licensees, license terms must not be extended; they are already too long now!

Because of the unfortunate death nearly three years ago of our President, the late legendary Frank Orme, NABB has gone through a period of reorganization. However, we are now back, stronger and more



Non-Profit Corporation

The Honorable Reed Hundt, Chairman
Federal Communications Commission
May 22, 1996
Page Four

determined than ever to bring our goals to fruition!

Today, NABB stands as a viable, operational organization that has gained international recognition for its influence on program standards and broadcasting industry practices.

The Commission will be hearing more from NABB.

We look forward to your response to our comments.

Very truly yours,

cc: Directors

The Honorable Susan Ness, Commissioner
The Honorable Rachelle B. Chong, Commissioner
The Honorable Albert Gore, Vice-President of
The United States
Andrew Jay Schwartzman, Media Access Project
Angela J. Campbell, Citizens Communication
Center Project, Georgetown University Law Center
Kathryn C. Montgomery, Ph.D., Center For Media
Education